

**Responsiveness Summary
for
Comments Received During Public Notice Regarding
Proposed Air Quality Permit No. 1000149
APS - Fairview
December 19, 1998**

The following comments were submitted by APS through the letter dated November 24, 1998.

Attachment "A"

Comment 1: Since the initial draft of Fairview's Title V permit, ADEQ extensively revised the Attachment "A" to the permit. To facilitate and expedite the permit review and approval cycle, I developed a redlined Attachment "A" which is identical to the edited version of Attachment "A" from the Cholla Power Plant proposed permit (permit #1000108). The redlined version of Fairview Attachment "A" details specific changes we believe should be made to the attachment. This redlined version is included as an attachment to this letter.

The suggested changes are summarized as follows:

Change 1: Attachment "A", Section II

Reference A.A.C. R18-2-306.A.8.a and b

Response 1: The requested change has been made.

Change 2: Attachment "A", Section III

Reference A.A.C. R18-2-321.A (not -321)

Response 2: The requested change has been made.

Change 3: Attachment "A", Section VII.A.2

Change "compliance status of..." to "compliance status with..."

Response 3: The requested change has been made.

Change 4: Attachment "A", Section XII.A.1

Cite the definition of excess emissions as R18-2-101.37.

Response 4: The requested change has been made.

Change 5: Attachment "A", Section XII.A.1.b.(7)

Remove the reference to Steam Units 2 and 3.

Response 5: The requested change has been made.

Change 6: Attachment "A", Section XII.B

APS has requested the replacement of the words “condition” with “situation” and “demonstrate” with “indicate”.

Response 6: The federal language from 40 CFR 71.6 has been changed in the past year. The language suggested by APS reflects the most current language. Therefore, the suggested changes have been made.

Change 7: Attachment “A”, Section XII.B.2

APS has requested the addition of the prompt reporting of deviations from an underlying applicable requirement to supersede reporting required when there is no underlying applicable requirement.

Response 7: The request has been denied. The Department requires reporting of deviations within 2 working days.

Change 8: Attachment “A”, Section XII.C.1.a

APS requested that the reference to the conditions or paragraph (c) should be changed to paragraph (b).

Response 8: The requested change has been made.

Change 9: Attachment “A”, Section XII.D

The addition of the phrases “is continuous” and “to discuss and agree upon a time frame for the submittal of a compliance schedule” to this section was requested.

Response 9: The request for these changes has been denied. The intent of this section is to cover situations of extended noncompliance. The language chosen by the Arizona Department of Environmental Quality describes what is required by the permittee and no changes are necessary.

Change 10: Attachment “A”, Section XIV.2

The addition of excess emissions reports to the reporting requirements has been requested.

Response 10: The requested change has been made. In addition, emergency reports have also been added.

Change 11: Attachment “A”, Section XVII.A.1

The reference to ARS 49-401.01(17) should be changed to ARS 49-401.01(18).

Response 11: The requested change has been made.

Change 12: Attachment “A”, Section “XVII.C”

APS has requested the addition of this section in order to address the trading of emissions allowed for sources not covered under a general permit (A.A.C. R18-2-317.C).

Response 12: The requested change has been denied. The applicable implementation plan for Arizona does not provide for such emission trades. In the future, if such allowances are made in this state, APS would be allowed to make changes pursuant to A.A.C. R18-2-317.C without a revision to the permit.

Change 13: Attachment “A”, Section XVII.C

APS requested the phrase “which may result in an increase or decrease in emissions” to this paragraph. The reason that they requested this change was so that routine maintenance and repairs would not have to be filed

with the Department.

Response 13: This section has been directly quoted from the rule. This rule is designed to allow for operational flexibility, not overly burdensome reporting of routine maintenance. Therefore, the request has been denied.

Change 14: Attachment “A”, Section XVIII.A

The source has requested that performance testing be allowed at “or above 90%” of the maximum capacity of the unit. Secondly, they have requested that the reference to the definition start-up, shutdown and malfunction be the permit and not A.A.C. R18-2-101.

Response 14: The requested change has been denied. The rules under A.A.C. R18-2-312 do not allow for this provision. The source may perform testing at a lower rate if they receive prior approval from the Director. In addition, the reference to the definition of start-up, shutdown and malfunction must be to the rules and not the permit since the permit does not define them.

Change 15: Attachment “A”, Section XVIII.B

The addition of A.A.C. R18-2-312.B has been requested.

Response 15: The requested change has been made.

Change 16: Attachment “A”, Section XVIII.D

The source has requested the addition of the sentence “If the Director, or the Director’s designee is present, tests may only be stopped with the Director or such designee’s approval” to this paragraph.

Response 16: The requested change has been made, this sentence was inadvertently left out of the original permit.

Change 17: Attachment “A”, Section XVIII.F

The source has requested the deletion of this paragraph.

Response 17: The requested change has been made. The requirements of this section have been incorporated into Section XVIII.D and was not subsequently deleted from Section XVIII.F.

Attachment “B”

Comment 1: Attachment “B”, Section I.B.1.b.(1)

The proposed permit lists reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne during certain operations. The corresponding referenced rule identifies landscaping as an optional precaution; however, this option is omitted in the proposed permit. The option to use landscaping as a measure to control particulate matter should be added to the permit.

This section also lists covering as an optional precaution. We would like clarification as to whether the use of gravel is an acceptable covering to control excessive amounts of particulate matter from becoming airborne.

Response 1: Landscaping was added to this paragraph as an additional optional precaution. Additionally, parking areas and driveways were added. Gravel is an acceptable covering control measure.

Comment 2: Attachment “B”, Section I.B.1.b.(2)

The proposed permit states “Use approved dust suppressants, adhesive soil stabilizer, or paving on, or bar access to driveways, parking areas, and vacant lots where motor vehicular activity occurs;”

We believe that this requirement is taken out of context from the cites regulatory reference. A.A.C. R18-2-604.B states “No person shall cause, allow, or permit a vacant lot, or urban or suburban open area...” Accordingly, the references to driveways and parking lots should be removed from the proposed permit.

Response 2: The reference to parking areas and driveways was removed and changed to urban or suburban open area.

Comment 3: Attachment “B”, Section I.B.1.b.(7)

The proposed permit states “with a minimum fall of material and with the use of...” This should be worded “with a minimum fall of material or with the use of...”

Response 3: The requested change has been made.

Comment 4: Attachment “B”, Section I.C.4.a

The permit states “agricultural vehicles, or are agricultural...” The word “are” should be deleted.

Response 4: The requested change has been made.

Comment 5: Attachment “B”, Section II.B.1.a

The proposed permit requires APS to maintain a record of the contractual agreement with the fuel vendor. However, APS uses the pipeline specification to purchase fuel oil rather than a contractual agreement. Items 2 through 7 under II.B.1.a are identifies on the fuel oil purchase specification sheet and it is more appropriate only to require the maintenance of the specification data. The requirement to maintain a copy of the contractual agreement with the fuel oil vendor should be removed.

Comment 5: Attachment “B”, Section II.B.2.c

The proposed permit states “maintain a record of the opacity reading from above and...” To ensure clarity, this should state “maintain a record of the opacity from II.B.2.b and...”

Response 5: The requested change has been made.

Comment 6: Attachment “B”, Section II.B.3.a & b

As written, we interpret the testing requirement to be triggered after 968 hours of turbine operation on a 12-month rolling basis and within six months of the trigger date, the test must be completed. After the completion of the performance test, the clock is reset to recommence monitoring for the 968 operational hours, which would then trigger another performance test.

It is our understanding the predominant reason for the performance test is to ensure accurate annual emission inventories. Accordingly, we believe a performance test should not be required more frequently than one per permit cycle since factors that may affect emissions would most likely result in substantially the same outcome. As such, we believe the performance test should only be required once per permit cycle.

Response 6: The intention of the permit was to have one test in the permit term, not each time the source triggers major source thresholds. The reference error led to some confusion as to the intent of the Department. The reference has been corrected - see Comment and Response 7.

Comment 7: Attachment “B”, Section II.B.3.b

The proposed permit states “in accordance with paragraph II.A.2.c...” We believe this should state “in accordance with paragraph II.B.3.a...”

Response 7: The reference has been changed to II.B.2.c. Once the test has been performed, the only record keeping requirements for hours of fuel burned are for the opacity measurements, not as a twelve month rolling total of all hours that fuel was burned.

Comment 8: Attachment “B”, Section II.D.2.a

The proposed permit states “the Permittee shall log in ink or in an electronic format...” One of the items required to be logged in ink or in an electronic format is the Material Safety Data Sheets. Since all MSDS are not maintained electronically, the permit should state “the Permittee shall maintain an MSDS for all paints and solvents used and log in ink or in an electronic format...”

Response 8: The requested change has been made.

Comment 9: Attachment “B”, Section II.D.3

The proposed permit states “Permittee shall keep a record of all emission related maintenance activities performed on the Permittee’s mobile sources stationed at the facility as per manufacturer’s specifications.” To ensure clarity, the permit should be reworded to state “Permittee shall keep a record of all emission related maintenance activities as per manufacturer’s specifications performed on Permittee’s mobile sources stationed at the facility.”

Response 9: The requested change has been made.

Comment 10: Attachment “B”, Section II.D.4

To ensure clarity on what necessary paperwork must be maintained on file by the Permittee, the permit should be revised to state “the Permittee shall keep on file the “NESHAP Notification for Renovation and Demolition Activities” form, and all supporting documents.”

Response 10: There are several supporting documents and relevant paperwork that must be kept on file by the permittee. The requested change has been denied.

Comment 11: Attachment “B”, Section II.D.5

Again, to ensure clarity, the permit should state “the Permittee shall maintain on file all records required by 40 CFR 82 - Subpart F.”

Response 11: There are several supporting documents and relevant paperwork that must be kept on file by the permittee. The requested change has been denied.

Comment 12: Attachment “B”, Section III.A

The proposed permit states “according to the schedule given in Section II.A.3...” The permit should state “according to the schedule given in Section II.B.3...”

Response 12: The requested change has been made.

Attachment “C”

Comment 1: Attachment "C", Article 6

The proposed permit listed R18-2-604.A as an applicable requirement. The permit should state R18-2-604.A and B as applicable requirements.

Response 1: The requested change has been made.

Comment 2: Other Applicable Requirements

We believe the following requirements should be also be listed as applicable requirements:

R18-2-802	Off-Road Machinery
R18-2-804	Roadway and Site Cleaning Machinery
R18-2-1101.8	Asbestos - NESHAP
40 CFR 82 (F)	Nonvehicle Air Conditioning Maintenance and Service

Response 2: The requested change has been made.